

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BEVERLEY M. HARRIS)	
Plaintiff,)	Civil Action No.: 2:18-CV-10277-MCA-SCM
)	
v.)	
)	
THE BOZZUTO GROUP, ET AL.,)	
)	
Defendant.)	
_____)	

DECLARATION OF WILLIAM HARRIS

1. I am employed by the Federal Bureau of Investigation ("FBI"), and I am a Supervisory Paralegal Specialist, currently assigned as the Acting Unit Chief of the Discovery Processing Unit I (DPU), Discovery Management Section, Litigation Branch, Office of the General Counsel (OGC), located in Washington, D.C. I have served in this capacity from approximately September 3, 2017, to the present. I have been employed with the FBI since September 22, 1991.

2. DPU I is one of two units who provide litigation support to the other units within OGC, as well as numerous other FBI entities. The DPUs are responsible for locating, reviewing, and processing for release any and all responsive materials which pertain to litigation and administrative matters in which the Bureau is either directly or indirectly involved. As Acting Unit Chief of DPU I, I am responsible for overseeing the Paralegal Specialists who locate,

review, process, and produce documents related to a variety of document production requests. I have access to the records contained in the FBI's Central Records System. I am also personally familiar with the FBI records maintenance and retrieval system.

3. The records in the FBI's Central Records System include records of administrative claims submitted to the FBI under the Federal Tort Claims Act. All administrative claims submitted to the FBI are indexed into the FBI's Central Records System. Once indexed, a record of an administrative claim is retrievable through a search of the general indices to the FBI's Central Records System. In short, the Central Records System is the FBI's official system of records for all investigative, administrative, and official business of the FBI.

4. The Central Records System enables the FBI to maintain information that it has acquired in the course of fulfilling its mandated law enforcement responsibilities. The records maintained here consist of administrative, applicant, criminal, personnel, and other files compiled for law enforcement purposes. Searching the FBI's Central Records System is the means by which the FBI can determine what retrievable information, if any, the FBI may have in its files on a particular subject matter or individual.

5. As Acting Unit Chief, I oversee the Paralegal Specialists who made a diligent search of the general indices to the FBI's Central Records System as of December 19, 2018. A search of the FBI's Central Records System did not locate any administrative claim submitted by or on behalf of the Plaintiff, Beverly M. Harris, directly to the FBI.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 19 day of December, 2018.

A handwritten signature in black ink, appearing to read "William L. Harris", written over a horizontal line.

William L. Harris

Acting Unit Chief, Discovery Processing
Unit I

Office of the General Counsel
Federal Bureau of Investigation
Washington, D.C.